

1
2
3
4
5
6
7 The Honorable _____

8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**
10 **AT TACOMA**

11
12 KENNETH PARKER and LINDA
13 PARKER, his wife,

14 Plaintiffs,

15 v.

16 WASHINGTON STATE
17 DEPARTMENT OF CORRECTIONS;
18 J. WU, M.D.; PATRICK BARNES PA-
19 C; ROBERT MORISS(?) PA-C;
20 NURSE JANE DOE, R.N. (Initials
believed to be M.M.); A. HARRIS,
R.N.; R. ROE (Last name unknown)
R.N.; and JOHN DOE MEDICAL
DIRECTOR,

21 Defendants.

22
23 State of Washington)
24) ss.
25 County of Thurston)

26 I, Paul F. James, being first duly sworn upon oath, testify as follows:

1 1. I am the assistant attorney general assigned to represent defendants
2 WASHINGTON STATE DEPARTMENT OF CORRECTIONS; J. WU, M.D.; PATRICK
3 BARNES PA-C; ROBERT MORISS(?) PA-C; NURSE JANE DOE, R.N. (Initials believed
4 to be M.M.); A. HARRIS, R.N.; R. ROE (Last name unknown) R.N.; and JOHN DOE
5 MEDICAL DIRECTOR, in their capacity. I am over the age of 18, competent to testify as to
the matters stated herein, and make this declaration based on my personal knowledge.

6 2. The State of Washington was served with Plaintiff's Complaint in the above-
7 entitled matter on March 28, 2011.

8 3. This case involves a claim that plaintiff, Kenneth Parker was deprived of his
9 constitutional due process rights pursuant to 42 U.S.C. § 1983 as well as possible related
state law claims.

10 4. Attached to the Notice of Removal to Federal Court, filed herewith, are true
11 and correct copies of the documents filed in the Thurston County Superior Court File No. 11-
12 2-00691-1.

13 DATED this 13th day of April, 2011.

15 ROBERT M. MCKENNA
16 Attorney General

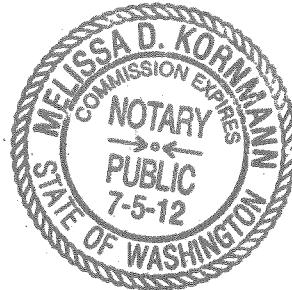
17 

18 PAUL F. JAMES, WSBA No. 13525
19 Assistant Attorney General
Atorneys for State Defendant

21 STATE OF WASHINGTON)
22) ss.
23 COUNTY OF THURSTON)

24 I certify that I know or have satisfactory evidence that Paul F. James is the person who
25 appeared before me, and said person acknowledged that he signed this instrument, on oath
stated that he is authorized to execute the instrument and acknowledged it on this 13th day of

1 April, 2011, to be the free and voluntary act of such party for the uses and purposes mentioned
2 in this instrument.



3 *Melissa Kornmann*
4 NOTARY PUBLIC in and for the State of
5 Washington, residing at Olympia, Washington.
6 My Commission Expires: 7/5/12

7 CERTIFICATE OF SERVICE

8
9 I hereby certify that on this 13th day of April, 2011, I caused to be electronically filed the
10 foregoing document with the Clerk of the Court using the CM/ECF system which will send
11 notification of such filing to the following:

12
13 Plaintiffs attorney:

14 **Mark Leemon**

15 leemon@leeroylaw.com

16 ROBERT M. MCKENNA
17 Attorney General

18
19 /s/ Paul F. James

20 PAUL F. JAMES, WSBA No. 13525
21 Assistant Attorney General
22 Torts Division
23 PO Box 40126
24 Olympia, WA 98504-0116
25 (360) 586-6300